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19 *Attorneys for Defendants*
20 UBER TECHNOLOGIES, INC., RASIER, LLC,
21 And RASIER-CA, LLC

22 **UNITED STATES DISTRICT COURT**

23 **NORTHERN DISTRICT OF CALIFORNIA**

24 **SAN FRANCISCO DIVISION**

25 IN RE: UBER TECHNOLOGIES, INC.,
26 PASSENGER SEXUAL ASSAULT
27 LITIGATION

28 This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
29 No. 23-cv-06708

30 Case No. 3:23-md-03084-CRB (LJC)

31 **DECLARATION OF LAURA VARTAIN
32 HORN IN SUPPORT OF DEFENDANTS
33 UBER TECHNOLOGIES, INC., RASIER,
34 LLC, AND RASIER-CA, LLC'S MOTION
35 TO EXCLUDE OPINIONS OF PLAINTIFFS'
36 EXPERT LINDSEY CAMERON**

37 Judge: Hon. Charles R. Breyer
38 Courtroom: 6 – 17th Floor

40 Judge: Mag. Lisa J. Cisneros
41 Courtroom: G – 15th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
 3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
 4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, "Uber") in this action. I have personal
 5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
 6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the October 24, 2025 Rebuttal Report
 8 of Lindsey D. Cameron, Ph.D.

9 3. Attached as **Exhibit 2** is a true and correct copy of the November 12, 2025 Deposition of
 10 Transcript (rough version) of Lindsey Cameron, Ph.D.

11 4. Attached as **Exhibit 3** is a true and correct copy of the 2016 Legis. Bill Hist. AZ H.B. 2652,
 12 Fiscal Analysis, May 4, 2016.

13 5. Attached as **Exhibit 4** is a true and correct copy of the Under Advisement Ruling, *Coslett*
 14 *v. Hannart*, No. CV 2018-005515 (Ariz. Super. Ct. Mar. 14, 2023).

15 6. Attached as **Exhibit 5** is a true and correct copy of the Under Advisement Ruling, *Klosa v.*
 16 *Goldman*, No. CV 2019-000428 (Ariz. Super. Ct. Aug. 21, 2022).

17 7. Attached as **Exhibit 6** is a true and correct copy of the Under Advisement Ruling, *Davis v.*
 18 *DoorDash, Inc.*, No. C20222745 (Ariz. Super. Ct. May 9, 2025)

19 I declare under penalty of perjury under the laws of the United States and the State of California
 20 that the foregoing is true and correct.

21 Executed on November 14, 2025, in San Francisco, California.

22 /s/ Laura Vartain Horn

23 Laura Vartain Horn

1 **E-FILING ATTESTATION**2
3
4 I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this
document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories
identified above has concurred in this filing.5 */s/ Laura Vartain Horn*
6 Laura Vartain Horn
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